

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS**

Ina Steiner,
David Steiner,
Steiner Associates, LLC,
(*Publisher of EcommerceBytes*)
Plaintiffs

CASE NO: 1:21-cv-11181

vs.

eBay, Inc., et al.,
Defendants

**PLAINTIFF'S MOTION TO EXTEND TIME TO FILE CONSOLIDATED
OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

Now come the Plaintiffs and respectfully request that this Court extend the time to file the consolidated Opposition to Defendants' Motions to Dismiss. In support thereof, Plaintiffs state the following:

1. Pursuant to this Court's November 12, 2021 Order, Plaintiffs were granted to January 31, 2022 to file a consolidated Opposition to the Defendants' Motion to Dismiss.
2. On January 29, 2022, the parties filed a Joint Motion to Stay the Proceedings so that Plaintiffs and Defendant eBay could attend mediation. Defendant Baugh opposed this request on February 4, 2022.
3. On February 7, 2022, this Court entered an Order granting the stay for 90 days, and Ordered that the parties file a status report no later than May 16, 2022 regarding the success of resolving this matter, in whole or in part.
4. Ninety days from the date of this Court's order is Sunday, May 8, 2022.

5. As the parties will outline in the status report, the parties were unsuccessful in resolving this matter, so Plaintiffs are filing an Opposition to the Defendants' Motions to Dismiss.
6. A draft of the Opposition is complete, however, Defendant Baugh pled guilty on April 25, 2022. Given that Defendant Baugh's admissions contradict most of the assertions in his Motion to Dismiss, counsel for Plaintiffs is currently in the process of editing the Opposition to include these admissions. Moreover, counsel for Plaintiffs is awaiting a copy of Defendant Baugh's plea transcript to complete the edits.
7. Given the circumstances, Plaintiffs are respectfully requesting an additional two weeks to complete and file the consolidated Opposition to Defendants' Motions to Dismiss.
8. Counsel for Plaintiffs recently contacted counsel for all Defendants via email to determine whether they assent to this motion, but has not yet received responses so counsel files this motion without their assent.

Wherefore, Plaintiffs request an additional two weeks to file their consolidated Opposition to Defendants' Motions to Dismiss, to Monday, May 23, 2022.

Respectfully submitted,
PLAINTIFFS
By their attorneys,

/s/ Rosemary Curran Scapicchio
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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2022, the foregoing document was filed electronically with the Clerk of the Court using the ECF system, for uploading and service by electronic notice to counsel and parties authorized to receive electronically Notices of Electronic Filing.

/s/ Rosemary Scapicchio